

EJK:SPN

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**14 MJ 311**

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UNITED STATES OF AMERICA

- against -

JACINTO PLUMMER,

also known as

"Marcus,"

Defendant.

COMPLAINT AND  
AFFIDAVIT IN SUPPORT  
OF APPLICATION FOR  
ARREST WARRANT

(21 U.S.C. §§ 963 and 960(b)(2)(B)(ii); 18  
U.S.C. 3551 et seq.)

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EASTERN DISTRICT OF NEW YORK, SS:

GREGORY J. STEMKOWSKI, being duly sworn, deposes and states that he is a  
Special Agent with the United States Department of Homeland Security, Homeland Security  
Investigations, duly appointed according to law and acting as such.

In or about November 2012, within the Eastern District of New York and  
elsewhere, the defendant JACINTO PLUMMER, also known as "Marcus," together with  
others, did knowingly and intentionally conspire to import a controlled substance into the  
United States from a place outside thereof, which offense involved 500 grams or more of a  
substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United  
States Code, Sections 952(a) and 960(a)(1).

(Title 21, United States Code, Sections 963 and 960(b)(2)(B)(ii); Title 18, United  
States Code, Sections 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the investigation of numerous cases involving the importation and distribution of narcotics. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; from reports of other law enforcement officers involved in the investigation; and from communication with two Confidential Sources.

2. According to a Confidential Source ("CS1"), whose information has proven reliable and been corroborated by other evidence in the case, in or about October 2012, the defendant JACINTO PLUMMER met with CS1 in the Bronx on multiple occasions and proposed that CS1 assist him in smuggling a substance from Guyana into the United States in exchange for money.<sup>2</sup>

3. CS1 eventually agreed, and the trip to Guyana was planned for November 2012.

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

<sup>2</sup> CS1 pled guilty on March 7, 2013, to conspiracy to import narcotics, in violation of Title 21, United States Code, Section 963, and was sentenced on September 30, 2013.

4. A second Confidential Source ("CS2"), whose information also has proven reliable and been corroborated by other evidence in the case, and who was a friend of CS1's, was recruited to join in the smuggling venture.<sup>3</sup>

5. Telephone records establish at least 21 calls between a telephone number that CS1 and CS2 independently identified as belonging to JACINTO PLUMMER and CS1's telephone number between November 13, 2012 and November 16, 2012, after which date CS1's phone service was cut off.

6. Telephone records establish at least 62 calls and several text messages between JACINTO PLUMMER's telephone number and CS2's telephone number between November 17, 2012, and November 24, 2012.

7. Travel records establish that on November 25, 2012, PLUMMER, CS1 and CS2 traveled to Guyana.


8. After arriving in Guyana, JACINTO PLUMMER gave CS1 and CS2 packages containing cocaine. PLUMMER had previously instructed CS1 and CS2 how to conceal the packages for travel back to the United States.

9. On November 28, 2012, CS1 and CS2 arrived at John F. Kennedy International Airport, where they were stopped for routine customs examinations, during which customs agents discovered the concealed packages containing narcotics.

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<sup>3</sup> CS2 pled guilty on March 18, 2013, to conspiracy to import narcotics, in violation of Title 21, United States Code, Section 963, and was sentenced on September 30, 2013.

WHEREFORE, your deponent respectfully requests that the defendant  
JACINTO PLUMMER be dealt with according to law.

  
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GREGORY J. STEMKOWSKI  
Special Agent, United States Department of  
Homeland Security, Homeland Security  
Investigations

Sworn to before me this  
3 day of April, 2014

  
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THE HONORABLE  
UNITED STATES  
EASTERN DISTRICT

S/Orenstein